

## Exhibit G

VN147

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address)		Telephone Number	FOR COURT USE ONLY	
Lenwood Hamilton 4926 Coyote Wells Circle Westlake Village, CA. 91362				
ATTORNEY FOR (Name):				
SUPERIOR COURT OF CALIFORNIA, COUNTY OF VENTURA <input type="checkbox"/> Limited Civil Case				
<input checked="" type="checkbox"/> 800 SOUTH VICTORIA AVE. VENTURA, CA 93009				
PLAINTIFF/PETITIONER: Faysal Shaarani, et. al.				
DEFENDANT/RESPONDENT: John M Pierce; Lenwood Hamilton				
<b>NOTICE OF MOTION AND MOTION FOR ORDER</b> <input checked="" type="checkbox"/> SETTING ASIDE DEFAULT <input checked="" type="checkbox"/> VACATING DEFAULT JUDGMENT <input checked="" type="checkbox"/> STAYING EXECUTION OF JUDGMENT <input type="checkbox"/> EXPARTE		CASE NUMBER: 56-2020-00543009-CU-BC-VTA  HEARING DATE: <u>04/06/2021</u> TIME: <u>8:30 am</u> COURTROOM: <u>42</u> COMPLAINT DATE: <u>July 01,2020</u>		

☒ **MOTION FOR ORDER SETTING ASIDE DEFAULT/VACATING DEFAULT JUDGMENT**

- Defendant Lenwood Hamilton does hereby move the court, pursuant to Section 473 of Code of Civil Procedure, for an order:  
☒ setting aside the default entered in this action on 08/26/2020  
☒ vacating default judgment entered in this action on 01/14/2020
- Defendant further moves for an order permitting defendant to:  
☒ file an Answer, a true and correct copy of which is attached to this motion and incorporated by reference.  
☐ appear at a trial on the merits.
- This motion is brought because ☒ default ☒ default judgment was/were taken against defendant:  
☒ Defendant was mistaken as to some material fact or law relating to defendant's duty to respond.  
☒ Through inadvertence and/or oversight defendant failed to timely respond.  
☐ Defendant was prevented from responding due to an unexpected condition or situation which arose, without any default or negligence on his /her part, and which ordinary care could not have prevented.  
☐ Other \_\_\_\_\_
- Defendant possesses a meritorious defense against the unlawful detainer or other civil action.

Short Title:  
Shaarani v Pierce

Case Number:  
56-2020-00543009-CU-BC-VTA

☒ **MOTION FOR ORDER STAYING EXECUTION**

5. Defendant, Lenwood Hamilton, respectfully applies under Section 918 of the Code of Civil Procedure, for an order from this court directed to the Sheriff of Ventura County, to plaintiff, and to any other persons acting on behalf of or together with plaintiff, staying execution of the judgment entered in this action on the grounds that:
- ☒ Defendant would suffer hardship if the judgment were to be executed at this time.
  - ☒ The judgment may be set aside or modified as requested in defendant's motion to vacate default judgment.
  - ☐ The judgment may be set aside or modified in accordance with defendant's motion for a new trial.
  - ☐ The judgment may be set aside or modified in accordance with defendant's motion for judgment notwithstanding the verdict.
  - ☐ The judgment may be set aside or modified in accordance with defendant's motion for relief from forfeiture and restoration of the tenancy under Section 1179 of the Code of Civil Procedure.
6. The motion filed above is filed with this application, and is now pending before this Court.

**DECLARATION**

7. I am the defendant in this action. I am asking the court to set aside ☒ default ☒ default judgment in this case.
8. I did not ☒ file a response to the summons and complaint ☐ appear at the trial in the case because ☐ I did not receive the summons and complaint until \_\_\_\_\_.
- ☐ I was unable to come to the court because of the following medical emergency:

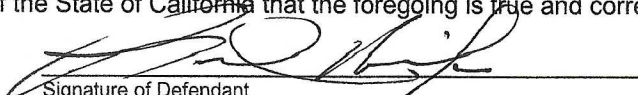
☒ Other:

See attached

9. I have the following defense to ☐ eviction ☒ civil complaint for amages
- See attached Proposed Answer

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 2-26-2021

  
Signature of Defendant

MC-025

SHORT TITLE:

Shaarani v Pierce

CASE NUMBER:

56-2020-00543009-CU-BC-VTA

**ATTACHMENT** (Number): VN147 #8*(This Attachment may be used with any Judicial Council form.)*

I did nothing deliberately when my court date was in the courts I called the courthouse myself to find out when I was supposed to be in court I received nothing in the Mail something just told me to call the courthouse when I called the courthouse they told me did my court date was March the 5th at 8:15 a.m. in court room 22B . When I call the port house, they told me that the decision was made on the 10th of February. I had no chance to defend myself he did not want to face me face to face so I could tell the courts when I'm telling you now. The first letter that came to me went to his house and not mine so he controlled everything and all of the information that I got I did not deliberately ignore anyone again all of this legal stuff is totally out of my realm of understanding. And so, by him being slick he backdoored me and got a decision without me being there the same as he did in my case.

*(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)*

Page \_\_\_\_\_ of \_\_\_\_\_

*(Add pages as required)*



56-2020-00543009-CU-BC-VTA

To whom it may concern,

My name is Linwood Hamilton. I am writing the court to let them know that this ordeal that I am in I had no control over. This attorney John Pierce uprooted me from Norristown PA. My case at the time he told me was worth in excess of a billion dollars. The meeting that we had was at the Marriott in Conshohocken, PA he took me and my friend out to lunch and he told us then along with other people that were in my group what my case was worth he then had a meeting with her lawyer that I had to release they Mr. Bruce Chason who tried to or who was dishonest. I believed in Mr. Pierce and I allowed him to bring me to California where I lived at his house in Chatsworth until he got a letter or received a letter from my ex-wife's attorney and Chason threatening to Sue him. He came out to Westlake or should I say he went in search of a house for me and my son at the time. My son David Hamilton and his girlfriend lived with us at his house for about a year. He then went in search of a place for me in Westlake village he gave me a choice to live in Chatsworth somewhere that was not to my liking. He then came up to Westlake and looked around and found the place that I'm in right now he told me that this place at 4926 coyote wells circle was going to go in the firm's name. I am a juvenile counselor, or I was a juvenile counselor I've always given back to where I came from, I grew up in 11 different institutions as a youngster. So, after going to college which I was never supposed to have gotten there. I chose to get into Youth Services. I was struck in the back of the head with a brick that is why I am on disability I make \$900 a month on disability neurological disability. I also suffer from hypertension and borderline diabetic there are times that I cannot even walk since I've been out here, I've been rushed to the hospital three or four times at Los Robles Regional Medical Center. Your honor, the first time that I received Mail I didn't know what it was. He told me when I came here that he was putting this property in the firm's name he also told me that I

56-2020-00543009-CU-BC-VTA

would probably not be here long once I start getting litigation funding he told me that they were going to be knocking the doors down because of my case value to give litigation funding to me when he first moved here or I should say moved me here he gave me \$40,000 to pay bills with and I did just that. When I found out that I had to leave the property he called me from a rehab and told me I had to leave I did not understand any of that because it was really hard for me to ever get in touch with him. A few of my friends came to see me my son got fed up and went back home to live with his girlfriend in Easton PA. I was all by myself and I started having real bad panic attacks. Mr. Pierce never told me that he had a drug problem I just found out that he is in trouble with the government and lenders for \$69 million I do not understand how someone can get away with what he did to me he borrowed 10s of millions of dollars against my case in stuck me in someone else house and it's not even in the firm's name. Your honor I would never do anyone the way he did me and the people that owns his property. When I called the lawyer for the people that owned his property he was very upset with me I told him I had no idea that this home was in John peeresses name and not the firm he also told me did Mr. Pierce did not communicate with him and was avoiding him Mr. Pierce told his secretary Lauren not to communicate with me because we were going to get into something over this house. I have no animosity towards the people that owns his property all I'm asking you for your honor is more time for me to try and find somewhere to live please I did nothing deliberately when my court date was in the courts I called the courthouse myself to find out when I was supposed to be in court I received nothing in the Mail something just told me to call the courthouse when I called the courthouse they told me did my court date was March the 5<sup>th</sup> at 8:15 a.m. in court room 22B . When I call the port house, they told me that the decision was made on the 10th of February. I had no chance to defend myself he did not want to face me face to face so I could tell the courts

56-2020-00543009-CU-BC-VTA

when I'm telling you now. The first letter that came to me went to his house and not mine so he controlled everything and all of the information that I got I did not deliberately ignore anyone again all of this legal stuff is totally out of my realm of understanding. And so, by him being slick he backdoored me and got a decision without me being there the same as he did in my case. But again, the people that own this property should Not be held hostage. My grandsons Aylen and Anden one is 8 and the other one is 6. I watched them throughout the day as you know they are not in school, your honor. I did not get a shot for this pandemic I'm 61 will be 62 May 14<sup>th</sup>, I did try to make contact with the people that owned the property and their lawyer told me not to call them again. I understand them being upset with Mr. Pierce and I am apart of Mr. Pierce, but I am not a mean person. I mean no harm to anyone, but right now not knowing anyone out here I have \$900 a month that I live off of Mr. Pierce does not pay any bills anymore this house is not in the firm's name apparently the people that own this piece of property here . My kids send me money to pay the electric gas waste management and I pay some of the bills out of my money I could get some help I would be out of here tomorrow I need some type of income to help me find another place some type of down payment but again I am not wanting to be here on my own I have nowhere to go. I am a sick man and I am asking the courts two please bear with me and give me a little more time I don't want to be here as bad as they don't want me here. I've fought for everything in my life and I know this has nothing to do with the court case against me in this place. If you read the Lynnwood skip Hamilton story, I think that Mr. Pierce underestimated my education and my understanding about a lot of things he took advantage of me. Out of \$69 million he couldn't give me enough money to get a place on my own or to pay for the place that I'm in he took advantage and he treated me like an animal by kicking me to the curb. I don't understand how the courts allows a person or a lawyer to get away with what he is trying to get

56-2020-00543009-CU-BC-VTA

away with. My son used to work for him at his law firm in Los Angeles he also brought my daughter to New York from Norristown PA to interview her for a job. So yes I think the drugs and the money got to his head and he said the hell with everybody else I am in one hell of a predicament your honor and I begged the court to give me more time to try and find a place I have to find money from somewhere my children can't continue to help me out they had little ones to raise thank you Anne understand please that I am not doing this deliberately I am not a squatter I was put in this position because I believed in Mr. Pierce and he turned out to be a crook and I hope that he's dealt with is the right way through the same system this trying to or that is putting me out of this place this is not right yours truly

A handwritten signature in black ink, appearing to read 'R. Hamilton', with a stylized, cursive script.

Mr. Hamilton.